

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA.

Plaintiff,

v.

LUCRETIA JAMES,

Defendant.

NO. CR08-244 RSL

**DECLARATION OF COUNSEL IN  
SUPPORT OF MOTION TO SEAL  
DEFENDANT'S MOTION TO INTERVENE  
AND UNSEAL SENTENCING RECORDS**

I, Jon R. Zulauf, declare the following to be true and correct to the best of my ability under penalty of perjury:

1. I have been appointed to represent the defendant, Lucretia James, who recently pled guilty to the crime of "conspiracy to possess with intent to distribute controlled substances."
2. It is alleged that she helped to deliver (as a mule) 72 kilograms of cocaine and 200,000 doses of MDMA.

**DECLARATION OF COUNSEL  
IN SUPPORT OF  
MOTION TO SEAL - 1**

**ZULAUF & CHAMBLISS**

TOWER BUILDING, SUITE 1301  
1809 SEVENTH AVENUE  
SEATTLE, WASHINGTON 98101  
(206) 682-1114

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6 4. Ms. James fears for her own safety and the safety if pleadings containing  
7 her cooperation agreements are revealed to the public.  
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15 7. Several unidentified people have made inquiries about when Ms. James will be  
16 released from prison.

17 8. For these reasons, Ms James believes that un-sealing court records would put her  
18 life in jeopardy.  
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20 9. For these reasons, Ms. James requests that the "Defendant's Opposition to the  
21 CBC's motion to intervene and unseal records" should itself be sealed.

22 Respectfully submitted this 8th day of October, 2009.

23 Zulauf & Chambliss

24 /s/ Jon R. Zulauf

25 Jon R. Zulauf WSBA #6936

26 Attorney For Lucretia James

Certificate of Service

I hereby certify that on October 8, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record for the government. I hereby certify that I have served the attorneys of record for the government that are non CM/ECF participants via United States Mail, postage prepaid.

/s/Darlene McLean  
Darlene McLean  
Legal Assistant for  
Jon R. Zulauf  
1809 7<sup>th</sup> Avenue Suite 1301  
Seattle, WA 98101  
Phone – 206.682.1114  
Fax – 206.343.5015